BELLSOUTH

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October 11, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-307 – Ex Parte # 1

Dear Ms. Dortch

This is to inform you that on October 10, 2002, Keith Milner, Glenn Reynolds and I met with members of the FCC staff to discuss BellSouth deployment of digital loop carrier (DLC) technology in its network. We also discussed the methods BellSouth uses successfully to enable DSL providers to provide their data services to customers whose loops terminate in a BellSouth remote terminal. FCC staff attending that meeting included: Greg Cooke; Christine Newcomb; Josh Swift, Rodney McDonald; Cara Grayer; John Minkoff; Denise Coca; Ruth Yodaiken; Julie Veach; Elizabeth Yockus; Gina Spade; and Aaron Goldberger. The attached document formed the basis for that presentation.

We also discussed the issues arising if switching were removed from the list of UNEs for all residential and business customers. Our comments on this topic were consistent with those made in our earlier meeting described in the BellSouth *ex parte* notice filed in CC Docket No. 96-98, CC Docket No. 98-147, and CC Docket No. 01-338 on October 7, 2002. In particular we explained that BellSouth has a reliable, efficient and timely hot cut process, scalable to meet increased demand.

In accordance with Section 1.1206, I am filing this notice and the accompanying attachment electronically and request that you please place them in the records of the proceedings identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz

Attachment

cc: Greg Cooke (w/o attachment)
Denise Coca (w/o attachment)
Janice Myles
Christine Newcomb (w/o attachment)
Elizabeth Yockus (w/o attachment)
Aaron Goldberger (w/o attachment)
Rodney McDonald (w/o attachment)
Luin Fitch
Beth Keating
John Minkoff (w/o attachment)
Ruth Yodaiken (w/o attachment)
Julie Veach (w/o attachment)
Gina Spade (w/o attachment)
Josh Swift, (w/o attachment)
Cara Grayer (w/o attachment)
James Davis-Smith
Sara Kyle

BellSouth Ex Parte

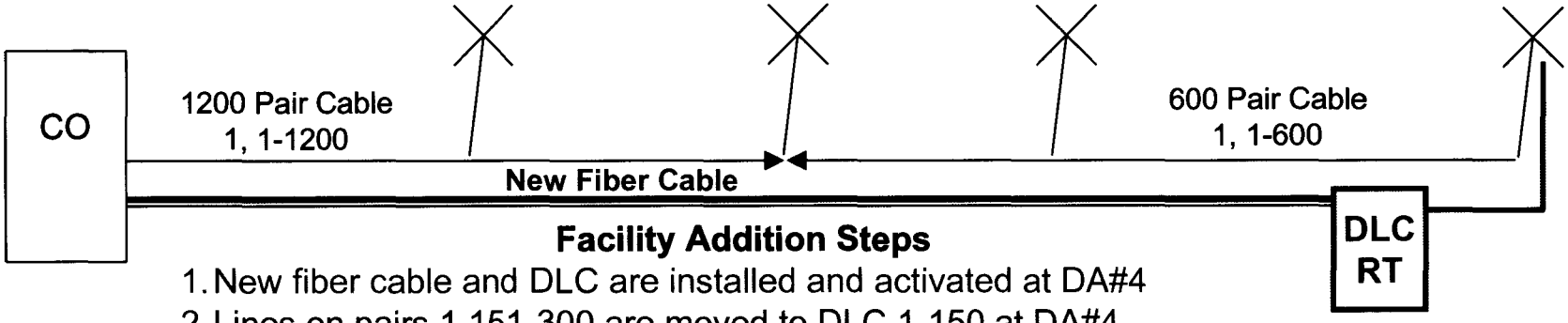
BellSouth's Loop Deployment

October 10, 2002

Illustration of How Using Fiber and Digital Loop Carrier To Provide Growth Facilities Can Result in The Removal of Copper Facilities

SCENARIO: Four distribution areas (DAs) in a route are served by a 1200 pair cable. Projected new development in the DAs is expected to require 200 additional feeder facilities in the next year with 50 additional facilities required at each DA. A route plan is developed to place fiber feeder cable and digital loop carrier to provide the 200 additional feeder facilities by placing the DLC at DA#4 to provide the 50 additional facilities at that site and also to move 150 lines from copper to DLC at DA#4. These vacated cable pairs can them be reallocated to DAs 1, 2, & 3 to provide the 50 additional facilities at each of those DAs.

Facility Allocation **After** Growth Facilities Added	DA#1 1, 901-1200+ **1,151-200**	DA#2 1, 601-900+ **1, 201-250**	DA#3 1, 301-600+ **1,251-300**	**DA#4** **1, 1-150+** **DLC 1-200**
Facility Allocation **Before** Growth Facilities Added	DA#1 1, 901-1200	DA#2 1, 601-900	DA#3 1, 301-600	**DA#4** **1, 1-300**



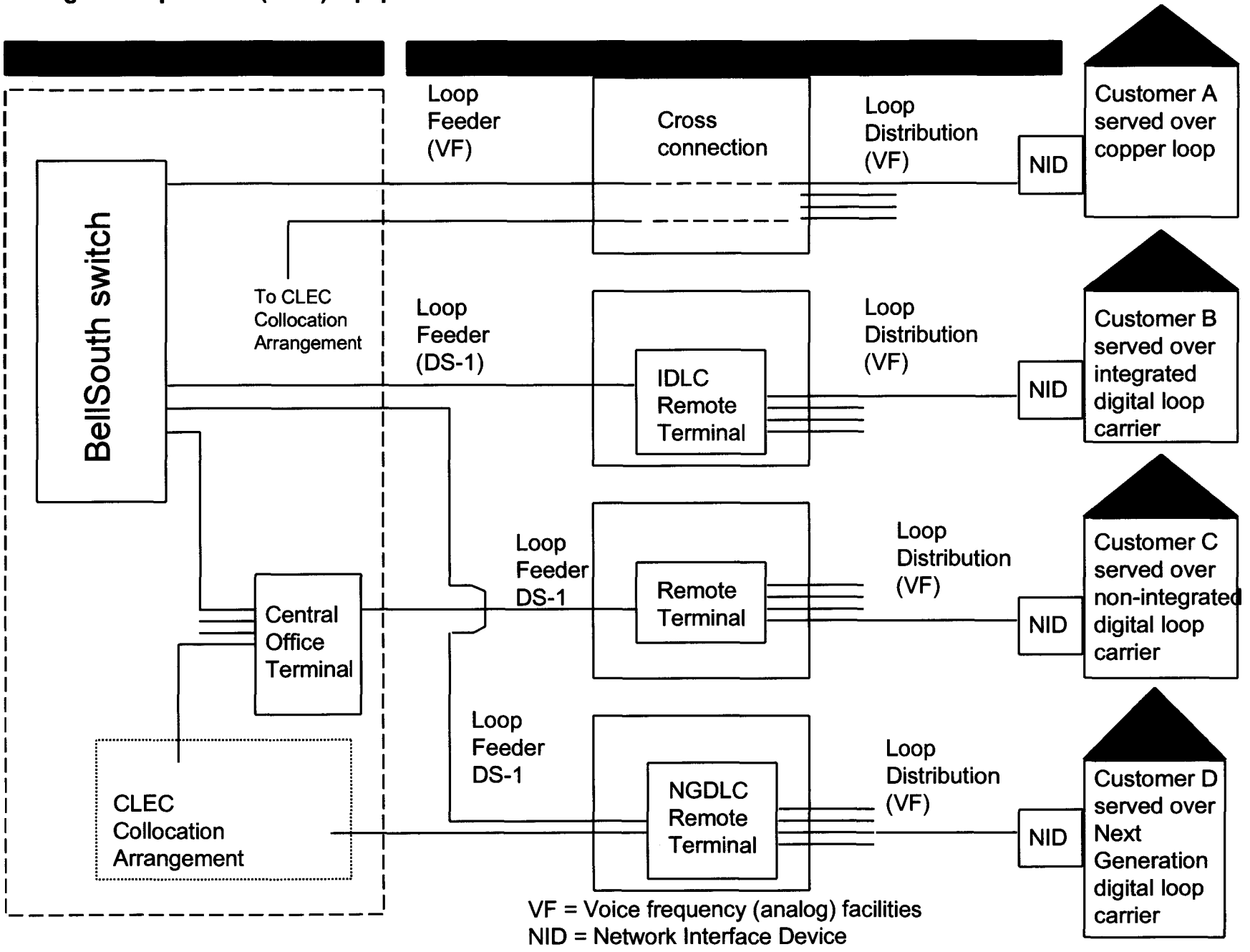
Facility Addition Steps

1. New fiber cable and DLC are installed and activated at DA#4
2. Lines on pairs 1,151-300 are moved to DLC 1-150 at DA#4
3. DLC 151-200 are allocated to DA#4 for growth
4. Vacated pairs 1,251-300 are allocated to DA#3 for growth
5. Vacated pairs 1,201-250 are allocated to DA#2 for growth
6. Vacated pairs 1,151-200 are allocated to DA#1 for growth

Scale of the Issue

- Approximately 189,300 Distribution Areas across the BellSouth Region
- Approximately 45,000 Digital Loop Carrier (DLC) Remote Terminals (RT)
- Approximately 1600 Wire Centers
  - Average of 4 Feeder Routes per Wire Center
  - Approximately 6,400 Feeder Routes
  - Approximately 30 Distribution Areas per Feeder Route
- Start-up cost for a DLC RT site averages between $30K and $50K

Unbundled loops served via
Integrated Digital Loop Carrier (IDLC) equipment



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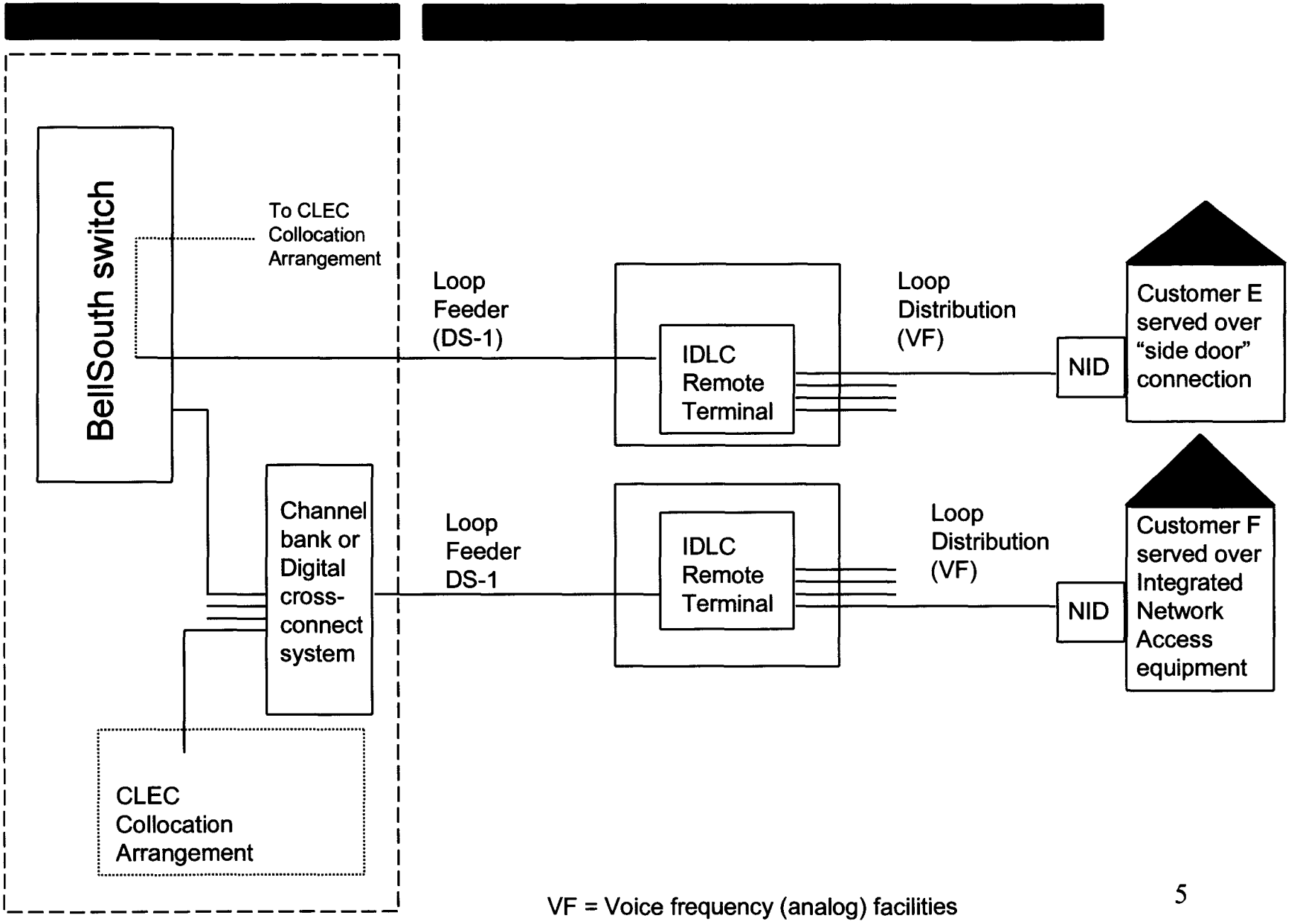

VF = Voice frequency (analog) facilities
NID = Network Interface Device

Interior view of Remote Terminal

External view of Remote Terminal